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6 Attorneys for the United States of America

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8 **UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

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10 UNITED STATES OF AMERICA,

11 Plaintiff,

2:17-mj-00678-CWH

12 vs.

13 COREY WYLIE BROWN,

14  
15 **STIPULATION FOR A  
PROTECTIVE ORDER**

Defendant.

16 The parties, by and through the undersigned, respectfully request that the Court  
17 issue an Order protecting from disclosure to the public, or any third party not directly  
18 related to this case, any documents, recordings, or other tangible things produced by the  
19 Government during discovery. The parties state as follows:

20 1. The Complaint in this case was filed June 29, 2017, charging the Defendant  
21 with Operating a Motor Vehicle Under the Influence of Drugs, Resulting in Death or  
22 Serious Bodily Injury and Operating a Motor Vehicle with a Controlled Substance in  
23 Blood.

1       2. The preliminary hearing is currently set for August 28, 2017. The  
2 Government desires and intends to continue producing discovery, as soon as possible.

3       3. The discovery in this case includes multiple recorded interviews and  
4 handwritten statements by witnesses, as well as photographs of the scene and of the  
5 deceased victim. The Government believes that dissemination of the discovery in this  
6 case could reveal the personal identifying information of various witnesses as well as the  
7 deceased victim.

8       4. In order to protect the personal identifying information of witnesses and  
9 the deceased victim, the parties intend to restrict access to the discovery in this case to  
10 the following individuals: the defendant, attorneys for the parties, and any personnel  
11 that the attorneys for the parties consider necessary to assist in performing that  
12 attorneys' duties in the prosecution or defense of this case, including investigators,  
13 paralegals, experts, support staff, interpreters, and any other individuals specifically  
14 authorized by the Court (collectively, the "Covered Individuals").

15       5. Without leave of Court, the Covered Individuals shall not:

- 16           a. make copies for, or allow copies of any kind to be made by any other  
17            person of the discovery in this case;
- 18           b. allow any other person to read, listen, or otherwise review the  
19            discovery;
- 20           c. use the discovery for any other purpose other than preparing to  
21            defend against or prosecute the charges in the Complaint or any  
22            further Indictment arising out of this case; or
- 23           d. attach the discovery to any of the pleadings, briefs, or other court  
24            filings except to the extent those pleadings, briefs, or filings are filed  
                  under seal.

6. Nothing in this stipulation is intended to restrict the parties' use or introduction of the discovery as evidence at the preliminary hearing, before the grand jury, at trial, or as support in motion practice.

7. The parties shall inform any person to whom disclosure may be made pursuant to this order of the existence and terms of this Court's order.

8. Should a reasonable need for this protective order cease to exist, on grounds other than a Covered Individual or some other person violating or circumventing its terms, the Government will move expeditiously for its dissolution.

9. The defense hereby stipulates to this protective order.

Respectfully submitted,  
For the United States:

STEVEN W. MYHRE  
Acting United States Attorney

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/s/

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CHRISTOPHER BURTON  
Assistant United States Attorney

For the Defense:

Roy L. Nelson, Esq.  
Attorney for COREY WYLIE BROWN

IT IS SO ORDERED:

CARL W. HOFFMAN  
United States Magistrate Judge

August 9, 2017

Date